

Message

From: Jones, Russell [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4795FDC630C34BE4AED0C6416A20D606-RUSSELL JONES]
Sent: 6/18/2019 4:34:36 PM
To: Foss, Steve (AGR) [SFoss@agr.wa.gov]; Schulze, Chad [Schulze.Chad@epa.gov]
Subject: RE: 1895-0049 YaraVita Biotrac 5-0-2 does not seem to meet the definition of a fertilizer | request for pesticidal determination

Steve:

Clearly, the statement “....including Ascophyllum nodosum, a rich source of cytokinins, auxins, and gibberellins.” is a plant regulator claim that triggers FIFRA

Russ J

Russell S. Jones, Ph.D., Senior Scientist
Chair, Biochemical Classification Committee
Risk Assessment Branch
Biopesticides & Pollution Prevention Division
Office of Pesticide Programs
US Environmental Protection Agency

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From: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Sent: Tuesday, June 18, 2019 11:34 AM
To: Jones, Russell <Jones.Russell@epa.gov>; Schulze, Chad <Schulze.Chad@epa.gov>
Subject: 1895-0049 YaraVita Biotrac 5-0-2 does not seem to meet the definition of a fertilizer | request for pesticidal determination

Hi Russ / Chad:

The product Biotrac 5-0-2 does not seem to meet the definition of a fertilizer and not clearly being used/intended for its plant nutrient content based on information from WSU (see below).

The product **BIOTRAC 5-0-2** contains kelp (seaweed) extract. As you may know, EPA published the Draft Guidance for Plant Regulator Label Claims, Including Plant Biostimulants on March 27, 2019 (see EPA-HQ-OPP-2018-0258. EPA has defined seaweed extracts as a heterogenous mixture of naturally-occurring plant regulators. Table 4 list of current EPA-registered, naturally-occurring, plant regulator active ingredients having modes of action and associated product label claims that are consistent with the FIFRA definition of a plant regulator. Information found by WSDA for this product claims this product contains growth natural plant growth regulators (e.g. cytokinins, auxins, and gibberellins).

QUESTION: Would EPA require Biotrac 5-0-2 to be registered as a biopesticide?

Thank you,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Koenig, Richard T <richk@wsu.edu>
Sent: Monday, June 17, 2019 11:58 AM
To: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Subject: RE: What are the typical application rates (lbs elemental/acre) for N, K, B and Zn on corn, potatoes, or grapes in Washington? Is YaraVita Biotrac 5-0-2 being used for its plant nutrient content?

Steve,

Generally, application rates would be the following:

N: 100 to 300 lb/acre/year
K: 0 to 400 lb/acre/year
B: 0 to 1 lb/acre/year
Zn: 0 to 10 lbs/acre/year

At the rates indicated, it is hard to fathom that the product would supply sufficient N or K to be a fertilizer source. Boron and Zn perhaps, especially in a foliar delivery.

Rich

From: Foss, Steve (AGR) [<mailto:SFoss@agr.wa.gov>]
Sent: Monday, June 17, 2019 11:34 AM
To: Koenig, Richard T <richk@wsu.edu>
Subject: What are the typical application rates (lbs elemental/acre) for N, K, B and Zn on corn, potatoes, or grapes in Washington? Is YaraVita Biotrac 5-0-2 being used for its plant nutrient content?

Dr. Richard T. Koenig, Associate Professor, Chair
WSU - Crop and Soil Sciences
201 Johnson Hall, PO Box 646420
Phone No : 509-335-2726
Email: richk@wsu.edu

Dear Dr. Koenig,

I am reviewing an application for a new product called YaraVita Biotrac 5-0-2. The label for BIOTRAC 5-0-2 states "This product is recommended for use in conjunction with a complete fertilization program based on soil or tissue analysis".

What are the typical application rates (lbs elemental/acre) for N, K, B and Zn on corn, potatoes, or grapes in Washington?

Assume this product is applied three times per year at 5 quarts/acre. Do you think YaraVita Biotrac 5-0-2 is being used for its plant nutrient content based on yearly application rates of 1.8 lbs nitrogen/acre, 0.72 lbs potassium/acre, and 0.396 lbs boron/ acre and 0.396 lbs zinc/acre?

Thank you,

Steve L. Foss, Program Specialist
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